



# State of New Jersey

Christine Todd Whitman  
Governor

Department of Environmental Protection

Robert C. Shinn, Jr.  
Commissioner

Mr. Stephen Cipit, Project Manager  
USEPA Region 2  
290 Broadway  
New York, NY 10007-1866

AUG 17 1999

Dear Mr. Cipit:

Re: L.E. Carpenter Superfund Site  
Wharton, Morris County

The New Jersey Department of Environmental Protection (Department) is in receipt of your letter dated July 23, 1999 regarding the MW-19/Hot Spot 1 Off-Site Subsurface Investigation. Presented below are responses to your comments.

The Department requested that wells be installed downgradient of the underground storage tanks to delineate the off-site extent, if any, of ground water contamination originating from the MW-19/Hot Spot 1 area. This request addresses your concerns presented in items 1, 2 and 3 of your letter. It should be noted, however, that the PRP proposed to install wells downgradient of this area in the November 1998 work plan. EPA requested the use of a hydro punch, geoprobe, or similar methodology in your letter dated December 4, 1998, which could not be fully implemented due to the geology in the area (i.e., boulders present caused refusal of the instrument). Had the wells been installed as proposed, this area would have already been delineated.

Regarding item 4 of your July 23, 1999 letter, the Department agrees that contaminant concentrations must show a statistically consistent decline over time in order for natural attenuation to be considered. However, this comment was not forwarded to the PRP since it was not relevant to this report. In addition, this requirement is included in the Department's Technical Requirements for Site Remediation.

Item 5 states that future samples should be analyzed for MTBE. These tanks contained MEK and waste MEK and waste pigments, therefore MTBE is not a contaminant of concern.



Please contact me at (609) 633-7261 if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Gwen B Zervas".

Gwen B. Zervas, P.E.  
Case Manager  
Bureau of Case Management